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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
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Application of BellSouth Corporation,	)	
BellSouth Telecommunications, Inc.	)	WC Docket No. 02-150
and BellSouth Long Distance Inc.	)	
For Provision of In-Region, InterLATA	)	
Services In Alabama, Kentucky, Mississippi,	)	
North Carolina and South Carolina		

**REPLY DECLARATION OF CHERYL BURSH AND SHARON E. NORRIS  
ON BEHALF OF AT&T CORP.**

August 5, 2002

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**REPLY DECLARATION OF CHERYL BURSH AND SHARON E. NORRIS  
ON BEHALF OF AT&T CORP.**

1. My name is Cheryl Bursh. I am the same Cheryl Bursh who, together with Sharon E. Norris, submitted a declaration in this proceeding as part of AT&T's opening comments on July 11, 2002.

2. My name is Sharon E. Norris. I am the same Sharon E. Norris who, together with Cheryl Bursh, submitted a declaration in this proceeding as part of AT&T's opening comments on July 11, 2002.

**I. PURPOSE AND SUMMARY OF DECLARATION**

3. The purpose of this Reply Declaration is to address BellSouth's recently-filed *ex partes* in this proceeding which raise issues regarding the integrity of BellSouth's performance data and to explain why those *ex partes*, coupled with AT&T's recent data reconciliation efforts and BellSouth's Change Control Notifications, confirm that Bell South has not met its burden of showing that its data are accurate and trustworthy.

4. AT&T's opening comments explained that, despite this Commission's hopeful expectations and BellSouth stated promises, BellSouth has failed to engage in any

meaningful way in the data reconciliation process. When AT&T has raised issues regarding the reliability of BellSouth's performance data, BellSouth has taken an unreasonably long time to respond, and its responses prior to its meeting with AT&T on July 23 were wholly inadequate. Indeed, BellSouth's knee-jerk reaction had been to dismiss AT&T's concerns, stating that AT&T's complaints evidence a fundamental misunderstanding regarding the performance reporting process.

5. Part II explains that AT&T's data reconciliation meeting with BellSouth on July 23 confirms that AT&T's concerns regarding the reliability of BellSouth's data were plainly warranted. During that meeting, BellSouth conceded that it must take remedial action to eliminate errors in the reporting process that AT&T has identified. Part II also explains that, BellSouth's lack of responsiveness regarding AT&T's data integrity inquiries, except when a Section 271 Application is pending, highlights the need for a documented process governing the data reconciliation process to ensure that CLECs obtain timely, substantive and complete responses to their data integrity inquiries.

6. Part III explains that BellSouth's own *ex partes* reveal that its performance data generated using PMAP 2.6 which are included in its Application are inaccurate. The KPMG Florida OSS test, during which KPMG concluded that it could not verify the accuracy of BellSouth's commercial performance data using PMAP 2.6, provides further confirmation that BellSouth's performance data in its Application which are based upon PMAP 2.6 should not be trusted. Additionally, BellSouth's most recent *ex partes* raise serious questions regarding the accuracy of its performance data using PMAP 4.0. Notably, metrics testing in Georgia using PMAP 4.0 is not yet completed, and KPMG anticipates that it will not complete its Florida

metrics testing (based upon PMAP 4.0) until October 31. Until those metrics audits are completed, the full extent of the inaccuracies in BellSouth's PMAP 4.0 data remains uncertain.

7. Part IV explains that, as DOJ correctly observed in its Evaluation, BellSouth has unilaterally changed metrics calculations without prior notice to the CLECs. Although DOJ notes that it expects that the Georgia PSC's entry of an order governing the metrics change control process should eliminate such problems in the future, BellSouth's August 1 Metrics Change Control Notification in which BellSouth revealed that it made yet another unilateral metrics change and failed to provide the required 60 days' notice as to other metrics changes confirms that BellSouth simply cannot be trusted. Additionally, that submission also reveals that BellSouth's performance data using PMAP 4.0 are riddled with errors underscoring the lack of merit in BellSouth's claim that its performance data are accurate.

## **II. BELLSOUTH HAS NOT FULFILLED ITS DATA RECONCILIATION COMMITMENT.**

8. In finding that BellSouth's data are "accurate, reliable and useful," the Commission relied on "the extensive third-party auditing, the internal and external data controls, the open and collaborative notices of metric workshops in Georgia and Louisiana, the availability of the raw performance data, BellSouth's readiness to engage in data reconciliations, and the oversight of the Georgia and Louisiana Commissions. . . ." *Georgia/Louisiana 271 Order*, ¶ 19. The Commission also admonished, however, that its approval of BellSouth's Georgia/Louisiana Application was based solely upon the record developed in that proceeding, and that "new evidence" that "demonstrate[s] that there are significant problems with the metrics data . . . may have a significant impact on [the Commission's] evaluation of the metric evidence in future 271 applications." *Georgia/Louisiana 271 Order*, ¶ 72. That new evidence presently exists.

9. During the Georgia/Louisiana 271 proceeding and in its current Application, BellSouth has insisted that the issues that AT&T has raised regarding the integrity of its data are meritless. *See* Bursh/Norris Decl. ¶ 33. Indeed, BellSouth has contended that AT&T's inquiries are so ill-founded that they reflect a basic lack of knowledge regarding the metrics business rules. Because of the insufficiency and untimeliness of BellSouth's responses, AT&T was forced to escalate its complaints within BellSouth. *Id.*, ¶ 32. It was only after AT&T advised BellSouth that it had failed to satisfy its commitment in the *Georgia/Louisiana 271* proceeding to engage in data reconciliation that BellSouth finally relented and agreed to discuss these issues in a meaningful way on July 23. *Id.*, ¶ 33. Moreover, there is every reason to believe that the pendency of its current Application before this Commission was the critical factor in BellSouth's decision to meet with AT&T to resolve these issues. *Id.*, ¶ 34. In any event, that meeting confirmed that AT&T's concerns regarding the integrity of BellSouth's performance data were well-founded.

10. In this regard, before the July 23 meeting AT&T advised BellSouth of data integrity problems involving BellSouth's LNP data. AT&T found that BellSouth improperly classified the *same* LNP LSRs as both "Issued Service Orders" (*i.e.* flow-through orders) in the LNP flow through report and as "Partially Mechanized Orders" (orders that are electronically submitted, but fall out for manual processing) in its FOC timeliness raw data. AT&T informed BellSouth that 725 LSRs identified as Issued Service Orders in BellSouth's March 2002 LNP LSR flow-through data were classified as partially-mechanized LNP LSRs in BellSouth's FOC timeliness raw data file. *Id.*, ¶ 36.

11. During the July 23 data reconciliation meeting between AT&T and BellSouth, BellSouth stated that, of the 725 LNP service orders at issue, 665 were electronically-submitted service orders that were viewed by a service representative, while the remaining 60 service orders were edited by a service representative. BellSouth also admitted that it had improperly classified LNP LSRs that were simply viewed, but not manually processed by a service representative, as partially-mechanized orders. BellSouth admitted that 665 of the 725 LNP Service orders should be classified as Issued Service Orders (orders that flow through), while the remaining 60 orders should be classified as BellSouth-Caused Fallout (orders that were manually processed) since these LSRs were edited by a service representative. Because these 60 LSRs were identified as flow-through orders in BellSouth's March 2002 LNP flow-through reports, BellSouth's LNP flow through rates were overstated. Furthermore, because the 665 orders were classified as partially mechanized (instead of fully mechanized orders) in BellSouth's FOC timeliness raw data, BellSouth's March FOC timeliness results were also inaccurate. Thus, notwithstanding BellSouth's prior assertions that AT&T's data integrity complaints were meritless, the July 23 meeting confirmed that AT&T's concerns regarding the reliability of BellSouth's LNP Flow Through and FOC timeliness results were, in fact, valid.

12. However, BellSouth compounded these errors by providing erroneous information regarding the timing of its implementation of corrective measures to eliminate this problem involving the improper classification of LNP service orders. During the July 23, 2002 data reconciliation meeting and in pre-filed testimony in Tennessee, BellSouth asserted that it "implemented a coding change with May 2002 data to more accurately identify when a service



rep handles a LSR in calculating the LNP flow through results.”<sup>1</sup> Thus, BellSouth represented that any problems involving the erroneous classification of LNP orders were resolved with May 2002 data. AT&T subsequently learned that this statement is false.

13. Upon examining the May 2002 raw data downloaded from PMAP – data which purportedly reflected BellSouth’s corrective action – AT&T discovered that 663 of AT&T’s Issued Service Orders which were classified as LNP flow-through raw data were also classified as Partially-Mechanized orders in the FOC timeliness raw data. On July 22, 2002, AT&T advised BellSouth of this discrepancy.<sup>2</sup>

14. On August 1, 2002, BellSouth informed AT&T that “[o]f the 663 in question, 619 were viewed by a service rep and the remaining 44 were edited by a service rep.”<sup>3</sup> According to BellSouth, 619 orders were fully-mechanized, flow-through orders, while 44 were partially-mechanized orders. Thus, although BellSouth represented in its testimony before the Tennessee Regulatory Authority and in its July 23 meeting with AT&T that, with May 2002 data, it had resolved the erroneous classification of LNP orders in its flow-through reports, BellSouth clearly had not resolved the problem at that time. Additionally, because these 44 LSRs were counted as “Issued Service Orders” in BellSouth’s LNP flow-through report, BellSouth’s May LNP flow-through reports are overstated. Furthermore, because 619 LSRs should have been

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<sup>1</sup> Rebuttal Testimony of Alphonso J. Varner before the Tennessee Regulatory Authority (“Varner Rebuttal Tennessee Test.”), filed July 22, 2002, Docket No. 97-00309 at 71.

<sup>2</sup> Electronic message from K.C. Timmons to Phillip Porter, dated July 22, 2002 (attached as Attachment 1).

<sup>3</sup> Electronic message from Jackie Foss to K.C. Timmons, dated August 1, 2002 (attached as Attachment 2).

classified as fully-mechanized orders (instead of partially mechanized orders) in the FOC timeliness raw data, BellSouth's May FOC timeliness results are also inaccurate.

15. Performance measurements serve no useful purpose if they do not accurately capture the performance they are intended to measure. The erroneous classification of services orders is a serious problem which should not be brushed aside since such errors spawn inaccuracies in reported results. In its Notification Report dated August 1, 2002 filed before the Georgia Public Service Commission ("Georgia PSC"), BellSouth explained the impact of this error on its Georgia results. BellSouth admitted that, as a result of the data reconciliation meeting with AT&T, it discovered that it had improperly classified as partially mechanized orders those LNP LSRs that were electronically submitted and which were simply "*viewed* by a service representative in the Local Carrier Service Center ("LCSC"), even though the LSR is not manually processed by the service representative."<sup>4</sup> Significantly, BellSouth admitted that approximately 19% of the LNP LSRs in BellSouth's March 2002 performance data were erroneously classified as partially mechanized orders. *Id.* Thus, by BellSouth's own admission, this error impacted a significant volume of the LNP orders in BellSouth's March Georgia data. Importantly, BellSouth's current Application includes LNP flow-through and FOC timeliness results for other months which undoubtedly are tainted by these same errors. Although the volume and impact of these errors remain unclear, these discrepancies belie BellSouth's claims that its performance data are accurate and reliable.

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<sup>4</sup> Letter from Bennett Ross to Reese McAlister dated August 1, 2002 attaching Notification Report, September 2002 Data Notification at 2 ("August 1 Notification") (attached as Attachment 3).

16. Furthermore, the July 23 data reconciliation meeting confirmed that AT&T's analysis regarding other data integrity issues which AT&T had raised were valid. Thus, for example, BellSouth admitted that negative intervals (which occur when BellSouth does not select the correct time stamp) caused data not to be processed. Additionally, the exclusion of these data from the PMAP raw data that BellSouth provided to AT&T rendered it impossible for AT&T to otherwise validate the accuracy of BellSouth's reported data.

17. BellSouth also admitted that system fixes were required to resolve other data integrity issues that AT&T raised. For example, AT&T had advised BellSouth that order volumes reflected in BellSouth's performance reports containing common sets of data did not match. As an example, AT&T pointed out that the order volumes in BellSouth's fully-mechanized flow through LSR Rejects did not match the LNP Reject Interval Service Requests. With respect to one OCN, AT&T found that 35 LSRs in the LNP Flow-Through Auto-Clarifications report were not reflected in the LNP Percent Rejected Service Requests Fully Mechanized Reject count. During the July 23 meeting, BellSouth admitted that it improperly classified 3 of the 34 LSRs as partially mechanized orders, and that a system fix was needed to ensure the proper classification of fully-mechanized orders which are simply viewed, but not manually processed by a service representative.

18. BellSouth also admitted that 31 of the 34 LSRs were actually clarified by a service representative, but satisfied the criteria to be classified as Auto-Clarifications in the LNP Flow-Through code. BellSouth stated that, with May data, its flow-through code would be changed so that LSRs which are clarified by a service representative are identified as CLEC-caused errors. With respect to the remaining LSR, BellSouth stated that that order was excluded

from the LNP Percent Rejected Review Service Requests Fully Mechanized Reject because an inbound file was missing from the EDI snapshot data.

19. Additionally, during the July 23 meeting, BellSouth addressed AT&T's concerns that the order volumes in BellSouth March 2002 Average Completion Notice Interval (ACNI) and Order Completion Interval raw data files did not match. BellSouth admitted that, in March 2002, it discovered a defect in the Order Completion Interval raw data processing code which caused incomplete raw data files to be downloaded over the PMAP website.<sup>5</sup> BellSouth provided the missing raw data in July 2002.

20. At the July 23 meeting, BellSouth conceded that it planned to take other corrective action to eliminate errors in its data that AT&T raised. BellSouth stated that it was then currently assessing a fix for the LNP Flow Through Orders so that expedited LNP Standalone LSRs are not automatically classified as Planned Manual Fallout. Thus, the July 23 meeting demonstrates that AT&T's concerns regarding the reliability of BellSouth's data were well-founded. That meeting also confirmed that BellSouth's reporting processes are not yet sufficiently stable to assure the accuracy of performance results.

21. As AT&T explained in its opening comments, BellSouth's responses to AT&T's data integrity concerns prior to the July 23 meeting were wholly insufficient and untimely. In finding that BellSouth's performance data are accurate, the Commission cited with approval BellSouth's willingness "to engage in data reconciliations with any requesting carrier."

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<sup>5</sup> However, concurrent with its implementation of PMAP 4.0, BellSouth started excluding from the "raw data files" all data except those used in calculating the metrics. All data listed as exclusions from the calculations have been excluded from the raw data files. As a result, CLECs are thwarted in their ability to use the raw data to determine the accuracy of BellSouth's performance results.

*Georgia/Louisiana 271 Order* ¶ 18. However, BellSouth has not lived up to that commitment. Indeed, it is highly unlikely that BellSouth would have provided any meaningful information on July 23 if its Application were not pending before the Commission.

22. Clearly, a CLEC's ability to obtain adequate responses to its data integrity inquiries should not depend upon whether the inquiry fortuitously coincides with the period during which BellSouth is seeking Section 271 approval before the Commission. In order to ensure that BellSouth lives up to its commitment to readily engage in the data reconciliation process, it is critical that a documented procedure be put in place to govern this process. As part of that process, AT&T proposes that BellSouth should acknowledge receipt of a CLEC request for data reconciliation within 24 hours. Within five business days of receipt of a CLEC data reconciliation request, BellSouth should notify the requesting CLEC of the date on which the CLEC will receive a complete response. The BellSouth response should be issued within fifteen business days of BellSouth's receipt of the CLEC's inquiry. If BellSouth cannot provide a response within fifteen business days of the request, its response to the CLEC should explain the reason for the delay. Furthermore, BellSouth should report the results of its data reconciliation investigation *via* the PMAP website so that those responses can be monitored by state commissions and this Commission. A defined data reconciliation procedure would ensure that BellSouth responds to CLECs in a timely manner, and that BellSouth satisfies its commitment and this Commission's expectations in the *Georgia/Louisiana 271 Order*.

### III. BELLSOUTH'S DATA USING PMAP 2.6 AND 4.0 ARE UNRELIABLE.

23. In its Application, BellSouth relies on data generated from January through March 2002 to demonstrate that it has satisfied its statutory obligations. In *ex partes*,

BellSouth also has submitted its performance results from May and June. BellSouth's data before April 2002 were generated using Performance Measurement Analysis Platform ("PMAP") 2.6, a "data collection and reporting platform." Varner Aff. ¶ 74. Commencing in April 2002, BellSouth's performance data have been generated using PMAP 4.0.

24. BellSouth contends that its upgrade from PMAP Version 2.6 to PMAP Version 4.0 "simply improves the system utilized to produce these measures." Varner Aff. ¶ 74. Indeed, BellSouth insists that many of the "enhancements to BellSouth's reporting capabilities that were implemented with Version 4.0" are not due to "defects in the Version 2.6 code." *Id.* ¶ 102.

25. BellSouth's most recent *ex partes* demonstrate that its performance data using PMAP 2.6 are flawed, and that the accuracy of BellSouth's data using PMAP 4.0 remains in serious doubt. In its July 11, 2002 *ex parte*<sup>6</sup>, BellSouth, using its March 2002 data, compared its performance results using PMAP 2.6 and PMAP 4.0 for four of the five states included in its Application. Even a cursory examination of the July 11 *ex parte* reveals that the data in virtually every metric in BellSouth's PMAP 2.6 results changed when BellSouth used PMAP 4.0 to generate performance results.

26. For example, BellSouth's data that were produced using PMAP 2.6 show that BellSouth satisfied the parity standard for the order completion interval measure (A.2.1.2.1.2) for business non-dispatch orders consisting of fewer than 10 circuits.<sup>7</sup> However, BellSouth's own analysis reveals that, when BellSouth generated performance data using PMAP

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<sup>6</sup> *Ex Parte* dated July 11, 2002 from Kathleen B. Levitz to Marlene H. Dortch ("July 11 *ex parte*").

<sup>7</sup> July 11 *ex parte*, AL Monthly State Summary Comparison Report at 2.

4.0, its performance results for this same measure show that BellSouth *failed* the parity standard. *Id.* Additionally, the retail and CLEC volumes changed significantly under PMAP 4.0.

27. Similarly, BellSouth's PMAP 2.6 performance data reveal that BellSouth *passed* the performance standard for the % missed installation appointments measure for Design (Specials)/<10 circuits/Dispatch/AL (A.2.11.3.1.1). However, BellSouth's performance results for this same measure using PMAP 4.0 show that it *missed* the performance standard. *Id.* at 3. Additionally, BellSouth's own submission reveals that order volumes change dramatically depending upon which PMAP version is used to process performance results. For example, BellSouth's analysis of the % Missed Installation Appointments measure for residential non-dispatch orders consisting of fewer than 10 circuits (A.2.11.1.1.2) shows that the retail volume increased by approximately 10,000, and that CLEC volume increased by approximately 500 when its data were generated using PMAP 4.0. *Id.* at 3.

28. BellSouth's July 11 *ex parte* is littered with other examples where its reported data under PMAP 2.6 showed that BellSouth passed the performance standard, while its results using PMAP 4.0 showed that BellSouth actually failed the performance results. Attachment 4 contains illustrative examples of metrics that were so affected.

29. Significantly, BellSouth's July 11 *ex parte* reveals that its reported results in Alabama using PMAP 2.6 changed as follows when using PMAP 4.0: (1) 26 measures which reported that BellSouth passed the performance standard under PMAP 2.6, failed the standard under PMAP 4.0; (2) 25 measures where BellSouth failed the performance standard under PMAP 2.6, passed the performance standard under PMAP 4.0; (3) 25 measures where BellSouth passed the performance standard under PMAP 2.6, reported no data under PMAP 4.0; (4) two measures,

where BellSouth failed the performance standard under PMAP 2.6, reported no data under PMAP 4.0; (5) four measures, which reported no data under PMAP 2.6, actually reported data under PMAP 4.0 showing that BellSouth passed the performance standard under PMAP 4.0; and (6) three measures, that had no data reported using PMAP 2.6, reported data under PMAP 4.0 showing that BellSouth failed the performance standard.<sup>8</sup>

30. Similarly, BellSouth's July 11 comparative analysis reveals that its Kentucky PMAP 2.6 performance results changed in the following ways when using PMAP 4.0: (1) 17 measures where BellSouth passed the performance standard under PMAP 2.6, reported a performance failure under PMAP 4.0; (2) 12 measures where BellSouth passed the performance standard reported no data under PMAP 4.0; (3) 17 measures showing that BellSouth failed the performance standard under PMAP 2.6, reported that BellSouth passed the standard under PMAP 4.0; (4) four measures which reported that BellSouth failed the performance standard under PMAP 2.6, reported no data under PMAP 4.0; and (5) nine measures that reported no data under PMAP 2.6, reported data under PMAP 4.0 showing that BellSouth passed the standard.<sup>9</sup>

31. BellSouth's July 11 *ex parte* also confirms that its Mississippi PMAP 2.6 reported results changed as follows using PMAP 4.0: (1) 17 measures reporting that BellSouth passed the performance standard under PMAP 2.6, reported a performance failure under PMAP 4.0; (2) 12 measures which reported that BellSouth passed the standard under PMAP 2.6, showed no data under PMAP 4.0; (3) 19 measures showing a performance failure under PMAP 2.6, reported that BellSouth passed under PMAP 4.0; (4) six measures which reported no data under

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<sup>8</sup> *Id.*, AL Monthly State Summary Comparison Report at 30.

<sup>9</sup> *Id.*, KY Monthly State Summary Comparison Report at 28.



PMAP 2.6, actually reported data under PMAP 4.0 showing that BellSouth passed the standard; and (5) two measures which reported no data under PMAP 2.6, captured data under PMAP 4.0 showing that BellSouth failed the performance standard.<sup>10</sup>

32. Additionally, BellSouth's comparative analysis reveals that its North Carolina data using PMAP 2.6 changed in the following ways under PMAP 4.0: (1) 37 measures which reported that BellSouth passed the performance standard under PMAP 2.6, reported a performance failure under PMAP 4.0; (2) 21 measures which reported that BellSouth passed the performance standard under PMAP 2.6, reflected no data under PMAP 4.0; (3) 26 measures which reported that BellSouth failed the standard under PMAP 2.6, showed that BellSouth passed the standard under PMAP 4.0; (4) one measure that reported that BellSouth failed the standard under PMAP 2.6, reported no data under PMAP 4.0; and (5) 11 measures which reported no data under PMAP 2.6, captured data under PMAP 4.0 showing that BellSouth passed the performance standard.<sup>11</sup>

33. Thus, BellSouth's July 11 *ex parte* demonstrates that order volumes, as well as BellSouth's reported success or failure on a given measure, changed dramatically when PMAP 4.0 was used to generate performance results. These discrepancies underscore that the accuracy of BellSouth's performance data included in its Application that were generated using PMAP 2.6 are untrustworthy.

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<sup>10</sup> *Id.*, MS Monthly State Summary Comparison Report at 28.

<sup>11</sup> *Id.*, NC Monthly State Summary Comparison Report at 31.

34. BellSouth's July 18 *ex parte*<sup>12</sup> further demonstrates that BellSouth's reported data under PMAP 2.6 are inaccurate, and that its data using PMAP 4.0 must be eyed with suspicion. In its July 18 *ex parte*, BellSouth analyzed the differences between its Georgia performance results for March and April 2002 generated under PMAP 2.6 and PMAP 4.0 for certain submetrics in the following measures: Firm Order Confirmation ("FOC") Timeliness; Provisioning Troubles Within 30 Days; and Reject Interval.

35. Thus, for example, in analyzing its performance results for SQM measure O-8 (Reject Interval), BellSouth stated that its results under PMAP 2.6 for March and April reported no data for the Combo Other product category. In stark contrast, BellSouth admitted that its results generated using PMAP 4.0 captured data for 48 LSRs for the Combo Other Product Category.<sup>13</sup> . In its July 18 *ex parte*, BellSouth concedes that product mapping under PMAP 2.6 was "not granular enough" to capture the LSRs in question. *Id.* at 13.

36. Similarly, BellSouth's July 18 *ex parte* reveals that its rejection interval results which were generated using PMAP 2.6 would have reported data for only one product (UNE DS1 Local Loop) for the Other Design product disaggregation. However, BellSouth admits that, under PMAP 4.0, significantly more products are mapped to the Other Design Product category.

37. Although BellSouth insists in its Application that its data using PMAP 2.6 are reliable, these dramatic changes in its performance results when PMAP 4.0 is used undercut BellSouth's assertion. Furthermore, KPMG in its Draft (as well as Final Report) of its OSS test

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<sup>12</sup> *Ex Parte* dated July 18, 2002 from Kathleen B. Levitz to Marlene H. Dortch ("July 18 *ex parte*").

<sup>13</sup> *Id.*, PMAP 4.0 System Analysis at 12-13.

in Florida has identified numerous measures that “could not be tested in the PMAP 2.6 environment because transformation documentation for data between the staging to NODS steps was unavailable” Bursh/Norris Decl. ¶ 65. These measures include many of the measures that BellSouth has identified as “key metrics.” *Id.* ¶ 65. *See also* Attachment 5. BellSouth’s own *ex partes* showing the differences in performance results and volumes that are generated when PMAP 4.0 is used, coupled with KPMG’s inability to test numerous measures using PMAP 2.6, highlight the paucity of BellSouth’s claim that its data in its Application that were generated using PMAP 2.6 are accurate and reliable.

38. To make matters worse, BellSouth’s July 18 *ex parte* also suggests that the accuracy of BellSouth’s data using PMAP 4.0 should be questioned. In that submission, BellSouth explains that data generated using PMAP 4.0, exclude records that would have been included in PMAP 2.6. For example, BellSouth’s July 18 *ex parte* reports the differences between the rejection interval results reported under PMAP 2.6 and 4.0 for 2-wire design orders. BellSouth concedes that the results reported for this product using PMAP 4.0 would *exclude* records that would have been captured under PMAP 2.6.<sup>14</sup> However, it is unclear from the *ex parte* whether these excluded orders are captured anywhere in BellSouth’s performance results on rejection notices.

39. In explaining the differences in its rejection interval results for 2 wire analog loop non-design orders, BellSouth concedes that its March results using PMAP 4.0, omitted 133 records that were captured using PMAP 2.6. BellSouth also explains that its April

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<sup>14</sup> BellSouth notes that “[f]or 2 Wire Voice Grade Loop-Design . . . March Partial Mech PMAP 4.0 data was less by 3 records, and Non-Mechanized PMAP 4.0 data was less by 4 records.” *Id.* BellSouth also admits that “[i]n April, PMAP 4.0 was less by 6, 2, and 10 in Mech, Part Mech, and Non-Mechanized respectively. July 18 *ex parte* at 24.

results using PMAP 4.0, omitted 14 LSRs that were captured using PMAP 2.6. *Id.* at 28.

However, it is unclear precisely where, if anywhere, these omitted LSRs are being captured in BellSouth's rejection notice timeliness results.

40. Equally troubling is BellSouth's analysis of the discrepancies in its results using PMAP 2.6 and PMAP 4.0 when measuring FOC timeliness for 2 wire non-design orders. BellSouth concedes that its March data using PMAP 4.0, omitted 270 LSRs that were captured using PMAP 2.6. *Id.* at 42. BellSouth also admits that its April data using PMAP 4.0, exclude 48 LSRs that were captured using PMAP 2.6. *Id.* In explaining these differences in results, BellSouth states that "PMAP 2.6 mapped the product ID for the 2 Wire Voice Grade Loop-Non-Design product group to 2.6 group ID 3070," and that, under PMAP 4.0, these two product IDs are combined "into one product ID-121." *Id.* at 42. However, BellSouth also admits that the exclusion of certain records from BellSouth's March and April data using PMAP 4.0 resulted from "PMAP 4.0 assigning these records to product ID 996 (UNE Other Loops at NP) rather than Product ID 121." *Id.* at 43. Notably, Product ID 996 "does not roll-up into a group required for reporting." *Id.* Thus, it appears that, even under BellSouth's much-touted PMAP 4.0, significant numbers of orders are being assigned to a product ID – a product ID which is not being captured in BellSouth's reported data.

41. Additionally, in analyzing its performance results for the % troubles in 30 days measure, BellSouth admits that 33 fewer records are reported for the Combo Other Product under PMAP 4.0 than under PMAP 2.6. *Id.* at 53. However it is unclear from BellSouth's analysis if those orders are captured anywhere in BellSouth's results for installation troubles.

42. Significantly, BellSouth's July 18 *ex parte* also confirms that its performance data under PMAP 4.0 may not be accurate when there is "multi response time stamp sequencing." *Id.* at 24. In this regard, BellSouth admits that "[i]f a response (for example: a clarification) is processed after a previous response (such as a FOC) and the time of the second response is before or after the time of the first response, the second response is not flagged for measure inclusion and calculation." *Id.* at 24. Because BellSouth's performance results using PMAP 4.0 omit clarifications processed after a FOC, by BellSouth's own admission, its performance results cannot be accurate.<sup>15</sup> BellSouth's July 18 *ex parte* includes a number of examples where data are excluded from performance results because of this multi-response sequencing problem.<sup>16</sup>

43. These discrepancies standing alone raise serious questions regarding the integrity of BellSouth's PMAP 4.0 data. Moreover, because the Georgia metrics audit is far from complete and the Florida metrics audit will not be completed until October 31, the full extent of any errors in BellSouth's PMAP 4.0 data remains unclear. Most recently, in analyzing BellSouth's performance data under PMAP 4.0 in the Florida OSS test, KPMG found that BellSouth erroneously excluded over 5,000 records that should have been captured in its calculations of ordering metrics.<sup>17</sup> In any event, based upon the current record, BellSouth cannot legitimately contend that its performance data using PMAP 2.6 or PMAP 4.0 are accurate.

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<sup>15</sup> It also appears that PMAP 4.0 excludes source data containing errors – data that would have been captured in PMAP 2.0 *Id.* at 25.

<sup>16</sup> *Id.* at 29, 43.

<sup>17</sup> KPMG Florida Exception 176, dated July 22, 2002. *See* Attachment 5A for current status of exceptions and observations in the metrics audits.

**IV. BELLSOUTH OWN METRICS CHANGE CONTROL NOTICES SHOW  
NONCOMPLIANCE WITH THE GPSC'S ORDER AND FLAWS IN PMAP 4.0.**

44. As AT&T explained in its opening comments, BellSouth continued to unilaterally revise the business rules governing the metrics even after this Commission, the Georgia/Louisiana Commission staffs, and the DOJ made clear “that changes to performance measurement calculations ‘should be made only with public notice and concurrence’” of the state commissions. *Georgia/Louisiana 271 Order*, ¶ 159 n. 575; Bursh/Norris Decl. ¶ 12. In its Evaluation, the DOJ states that “[g]iven the clear concerns raised and the support for advance notice and approval procedures expressed by the Department, the Georgia and Louisiana PSCs, and the FCC, the Department is troubled that BellSouth has made many additional changes to its reported performance metrics especially in converting from its computer platform PMAP 2.6 to PMAP 4.0, without notifying CLECs and regulators until after the changes were implemented.” DOJ Eval. at 12-13 (footnote omitted).

45. In its opening comments, AT&T also explained that, because BellSouth continued to make unilateral changes to the metrics, the CLECs were forced to file an emergency motion before the Georgia PSC. Bursh/Norris Decl. ¶ 21. Noting that the Georgia PSC has entered an order requiring BellSouth to provide advance notice of metrics changes, the DOJ states that it “expects” that this order, combined “with the necessary monitoring, [will] prevent the further recurrence of undisclosed, unapproved metrics changes.” DOJ Eval. at 14. Notwithstanding the Georgia PSC’s order and the DOJ’s hopeful expectations, BellSouth recently disclosed that it implemented yet more metrics changes without providing the required 60 days advance notice.

46. In its August 1 Notification, BellSouth filed a Metrics Change Notification Report for the September 2002 data month, as well as a Preliminary Notification Report for the October 2002 data month. In its August 1 Notification, BellSouth concedes that “[s]everal of the items in the attached September Notification Report were not previously identified in the Preliminary September Notification Report filed on July 1, 2002.” *Id.* at 1. In fact, BellSouth failed to provide the required 60 days’ advance notice for eight of the 15 proposed metrics changes to be implemented with its September 2002 data.

47. In its August 1 Notification, BellSouth also admitted that it had implemented another change without sufficient notice or commission approval, stating (*id.*):

BellSouth would also like to bring to the Commission’s attention an issue associated with the Preliminary Notification Report for the September 2002 data month that was filed on July 1, 2000. In that report BellSouth indicated that it was considering making a change with September 2002 data by which records going from RADS to PMAP warehouse would be written to the monitoring table in 50,000 increments. BellSouth has since discovered that this change had already been made with the June 2002 performance data. Although the change had no impact on performance measurement results, BellSouth regrets this error.

48. Furthermore, as DOJ correctly observes, “the changes described in BellSouth’s initial disclosures were poorly documented . . . and do not appear to contain the level of information contemplated by the Georgia PSC.” DOJ Eval. at 14 n. 51. The same holds true for BellSouth’s most recent Metrics Changes Notification. Thus, for example, in its August 1 Notification Report BellSouth states that it “proposes to implement changes to PMAP code to extract data necessary to calculate performance results consistent with the SQM.”<sup>18</sup> The August 1 Notification, however, glaringly omits information regarding the nature of the PMAP code

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<sup>18</sup> August 1 Notification, September 2002 Data Notification at 1.

changes, or how these changes, as implemented, will render the “performance results consistent with the SQM.” *Id.* See also Bursh/Norris, ¶¶ 18-20 (discussing the inadequacies of BellSouth’s Metrics Change Notifications).

49. Similarly, in its August 1 Notification, BellSouth admits that “lines counts and troubles associated with CLEC Digital Loops are captured on the SQM maintenance and repair reports[but were] inadvertently omitted from the UNE Other Design results as reflected on the MSS.” *Id.* at 6. BellSouth claims, however, that it has not been able to quantify the impact of this change for all of the affected measures, but expects it to be minimal.” *Id.* at 6. BellSouth’s explanation is nonsensical. Inasmuch as BellSouth has conceded that the missing CLEC Digital Loop data are reported in the SQM (but not the MSS Report), BellSouth clearly has the data and can quantify the impact of this error by restating performance results.

50. More fundamentally, BellSouth’s August 1 Notification further underscores that its performance data using PMAP 4.0 are error-ridden. For example, BellSouth admits that certain trouble reports “are not being captured in the volumes for BellSouth’s retail customer trouble reports for the Design (Specials) sub-metrics.” *Id.* at 6. BellSouth states that this error has caused its retail customer trouble report rates to be understated.

51. In its August 1 Notification, BellSouth notes that it has improperly included in its performance results “orders with a miscellaneous account code and a class of service code of ADP that are being issued to establish billing on resale and retail customers for DSL and satellite TV.”<sup>19</sup> Although BellSouth admits that 23% of its retail orders should have been excluded from multiple retail measures, BellSouth glosses over these failings and states that

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<sup>19</sup> *Id.* October 2002 Data Notification at 3.



“this change would have a minimal impact on Resale results, as there were only approximately 10 such orders in June 2002.” *Id.* at 3. Even assuming *arguendo* BellSouth’s statement is true, conspicuously absent from BellSouth’s submission is any information regarding the impact of its exclusion of 23% of its retail orders on performance results.

52. In its August 1 Notification, BellSouth contends that it is measuring the average completion notice interval (ACNI) for design orders by measuring the interval beginning with the first “circuit location” and proposes to measure the interval from the last circuit location. *Id.* at 4. BellSouth also explains that the effect of its current process causes the completion notice interval to be “hundreds of hours.” *Id.* In that connection, BellSouth states that, in April 2002, the retail ACNI dispatch mechanized interval for Design orders was 304 hours, as compared to 41 hours for CLECs. By BellSouth’s own admission, according to the June ACNI data, it took BellSouth 10.3 days from the first circuit location to the last circuit location for the work to be completed for its retail design dispatch orders consisting of greater than 10 circuits. Rather curiously, however, despite this lengthy interval, BellSouth’s June results show that it missed no appointments for these orders. Thus, BellSouth’s August 1 Notification explanation not only raises questions about the accuracy of its ACNI data, but it also raises concerns about the reliability of its missed appointments data. Moreover, these and other metrics changes reflected in BellSouth’s Notification Reports demonstrate that BellSouth has committed numerous errors in the performance reporting processing using PMAP 4.0 which are reflected in its performance results.<sup>20</sup> See Bursh/Norris Decl. ¶¶ 18-20.

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<sup>20</sup> BellSouth’s explanations regarding data integrity issues have been, in many respects, moving targets. In its response to KPMG Florida Exception 90 (which deals with the timeliness of FOCs), BellSouth stated that FOCs on orders submitted to the Complex Resale Support Group (“CRSG”) (which processes CLEC requests for Complex Resale and Complex UNE products)

CONCLUSION

53. BellSouth's Application fails to demonstrate that its performance data provide sufficient assurance that BellSouth has satisfied its Section 271 obligations. Contrary to the Commission's expectations, BellSouth has failed to fulfill its commitment to engage in meaningful data reconciliation. AT&T's most recent data reconciliation meeting with BellSouth – a meeting that BellSouth undoubtedly agreed to because of the pendency of its Application – confirmed that AT&T's concerns regarding the reliability of BellSouth's data were well founded. Furthermore, BellSouth's lack of responsiveness in addressing AT&T's data integrity inquiries – except when its 271 Applications are pending – highlights that a documented procedure is required to ensure that BellSouth fully responds to data inquiries in a timely manner.

54. Moreover, BellSouth's performance data are saturated with errors and discrepancies. BellSouth's own *ex partes* show that its performance results in its Application using PMAP 2.6 cannot be trusted, and that the accuracy of its data using PMAP 4.0 remains in doubt. The ongoing metrics audits in Florida and Georgia provide further confirmation that

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are excluded from Measure O-9 which measures FOC timeliness for non-mechanized LSRs. *See* BellSouth's Response to KPMG's 3<sup>rd</sup> Amended Florida Exception 90 at 4, 9 (attached as Attachment 6). However, in response to Data Request No. 25 during discovery in Tennessee, BellSouth stated that FOCs and rejections on orders submitted to CRSG are, in fact, measured. *See* Attachment 7. In its amended response to Exception 161 (which deals with rejects), BellSouth stated that both FOCs and rejects which are submitted to the CRSG are processed by the LCSC and are measured for the portion of the time they are processed by the LCSC. *See* BellSouth's Amended Response to KPMG's Florida Exception 161 at 5 (attached as Attachment 8). However, in rebuttal testimony, BellSouth reversed course again and stated that FOCs are measured (because they go from the CRSG to the LCSC for processing), but that rejections are handled by the CRSG and are not included in the reject measure. *See* Varner Rebuttal Tennessee Test. (noting that "[i]n the case of FOC Timeliness, any order that receives a FOC . . . is captured in the measure . . . [but that] [t]he CRSG is not included in the reject measure"). This example demonstrates that even BellSouth is uncertain as to precisely what data are included in its performance results.

BellSouth's data are untrustworthy. Until these audits are concluded, the full extent of any errors in its PMAP 4.0 data will remain a mystery.

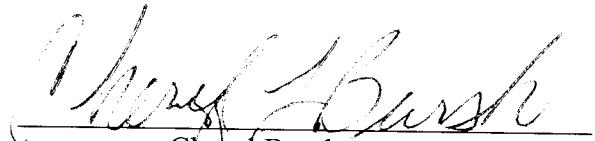
55. Additionally, BellSouth has failed to comply with the metrics change notification procedure ordered by the Georgia PSC. Indeed, BellSouth recently admitted that it made one unilateral change to the metrics calculations and failed to provide the requisite 60 days' notice with respect to other metrics changes. Worse yet, even BellSouth's most recent metrics change notice fails to provide sufficient information regarding the metrics changes that it proposes to implement.

56. As AT&T explained in its opening comments, even BellSouth's own unreliable data show that it has not satisfied its Section 271 obligations. These performance failures include, *inter alia*, low flow-through rates and untimely status notices. BellSouth's data also show that it does not provision CLEC orders at parity, and that it has otherwise failed to meet its statutory obligations. And BellSouth's performance remedy plans cannot and do not provide sufficient assurance that BellSouth will comply with its statutory obligations in the future.

57. Based upon the pool of evidence, BellSouth has utterly failed to demonstrate that its data are accurate and show statutory compliance, and that its performance remedy plans will assure statutory compliance in the future. For all of these reasons, BellSouth's Application should be rejected.

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on August 5, 2002

  
Cheryl Bursh

I hereby declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on August 5, 2002

Sharon E. Norris  
Sharon E. Norris

# **ATTACHMENT 1**

-----Original Message-----

From: Timmons, King C (K.C.), NCAM [mailto:ktimmons@att.com]

Sent: Monday, July 22, 2002 3:34 PM

To: Phillip Porter - BellSouth

Subject: May LNP Data Integrity Issue

Phil,

At tomorrow's meeting, we will be discussing a LNP data integrity issue that I brought to your attention in a May 28 e-mail. Specifically, I was mainly concerned with the large number of March LNP LSRs that BellSouth was considering both "Issued Service Orders" in the LNP Flow Through Report and "Partially Mechanized" in the FOC Timeliness Raw Data. This data integrity issue also corresponds with Florida Exception 184 in the KPMG Third Party Test. According to the May raw data downloaded from PMAP, it appears that the issue has not changed. In May, there are 663 Issued Service Orders in the LNP Flow Through raw data that are also labeled as "Partially Mechanized" in the FOC Timeliness raw data. Attached is the supporting data:

<<May 02 ATT\_LNP\_LSR\_Flow\_Through\_Log.xls>>

Again, I do not understand how a LSR can be considered an "Issued Service Order" in the LNP Flow Through Report and be "Partially Mechanized" at the same time. I look forward to our discussion tomorrow.

Thanks,

KC Timmons

Manager Supplier Performance Measurements

AT&T Local Services - Southern Region

Phone: 404-810-3914

Pager: 1-888-858-7243 Pin: 115394

Fax: 281-664-3671

e-mail: ktimmons@att.com

## **ATTACHMENT 2**



-----Original Message-----

From: Foss, Jackie [mailto:Jackie.Foss@BellSouth.com]

Sent: Thursday, August 01, 2002 2:25 PM

To: Timmons, King C (K.C.), NCAM

Cc: Porter, Phillip; Foss, Jackie; McDonald, Ted; Hazelwood, Becky;  
Varner, Al

Subject: RE: May LNP Data Integrity Issue

KC,

We have completed the review of your 663 orders that appeared as Partially Mech in the FOC

Timeliness Raw Data. Of the 663 in question, 619 were viewed by a service rep and the remaining 44 were edited by a Service Rep. Specific occurrences are in the attached which contains your original file with an additional column labeled "Findings".

As discussed in our meeting on July 23, if edited at any time by a Service Rep, the service order will fall into Partial Mech in FOC Timeliness. LNP LSRs viewed but not processed by a service representative are currently classified as partially mechanized. A pending code enhancement will cause such LSRs to be appropriately classified as fully mechanized in O-7, O-8, O-9, and O-11.

\* Ordering Reports from GA SQM

O-7 Percent Rejected Service Requests

O-8 Reject Interval

O-9 Firm Order Confirmation Timeliness

O-11 Firm Order Confirmation and Reject Response Completeness

We hope this provides the information you need. If you have further questions, please let us know.

Thank you,

Jackie Foss

CLEC Interface Group

BellSouth Telecommunications

404-927-4109

# **ATTACHMENT 3**

BellSouth Telecommunications, Inc.  
Legal Department  
1025 Lenox Park Boulevard  
Suite 6C01  
Atlanta, GA 30319-5309  
  
bennett.ross@bellsouth.com

Bennett L. Ross  
General Counsel - Georgia  
  
404 986 1718  
Fax 404 986 1800

August 1, 2002

**DELIVERED BY HAND**

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's  
Operations Support Systems; Docket 8354-U*

*Performance Measurements for Telecommunications Interconnection,  
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the September 2002 data month and a Preliminary Notification Report for the data month of October 2002. These proposed changes will be discussed at the August 7, 2002 industry conference call. Several of the items on the attached September Notification Report were not previously identified in the Preliminary September Notification Report filed on July 1, 2002. However, BellSouth feels that it is necessary to make these changes at this time to ensure BellSouth reports accurate data.

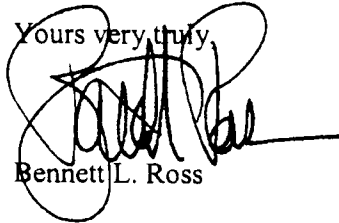
BellSouth would also like to bring to the Commission's attention an issue associated with the Preliminary Notification Report for the September 2002 data month that was filed on July 1, 2002. In that report BellSouth indicated that it was considering making a change with September 2002 data by which records going from RADS to the PMAP warehouse would be written to the monitoring table in 50,000 increments. BellSouth has since discovered that this change had already been made with June 2002 performance data. Although the change had no impact on performance measurement results, BellSouth regrets this error.

Enclosed please find an original and eighteen (18) copies, as well as an electronic version, of these Notification Reports, and I would appreciate your filing same and returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Mr. Reece McAlister  
August 1, 2002  
Page 2

Thank you for your assistance in this regard.

Yours very truly,

A handwritten signature in black ink, appearing to read "Bennett L. Ross", written over the closing "Yours very truly,".

Bennett L. Ross

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)  
Parties of Record (w/enclosure) (via electronic mail)

456944

## SEPTEMBER 2002 DATA NOTIFICATION

BellSouth proposes to make the following changes, described below, to generate results for the September 2002 data month, preliminary results for which will be posted on October 21, 2002, with final results being posted on October 31, 2002. BellSouth provides this notice consistent with the Georgia Public Service Commission's July 19, 2002 Order, which requires that, on the first business day of the month preceding the data month for which BellSouth proposes to make any change to method by which its performance data is calculated, BellSouth must provide written notice of any such proposed changes as well as provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following month. The "affected measures" described in the notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, and all impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

### Ordering Measurements

- (1) *Affected Measures:* All ordering measures and P-10

*Description of Change:* With the implementation of Release 10.6, which is currently scheduled for August 27, 2002, BellSouth proposes to implement changes to PMAP code to extract data necessary to calculate performance results consistent with the SQM. This proposed change was Item (1) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1181 & RQ1194)

*Impact of Change:* None

- (2) *Affected Measures:* O-8 & O-9

*Description of Change:* If the outbound timestamp for an Local Service Request ("LSR") for Local Number Portability ("LNP") is missing in EDI or TAG, PMAP captures the timestamp from the LNP Gateway. However, the field that PMAP currently uses contains the outbound timestamp of the last response for the LSR, which is not necessarily the transaction for which duration should be calculated. BellSouth proposes to change the code so that PMAP will select the appropriate LNP Gateway timestamp in cases when the outbound timestamps are missing from EDI or TAG. This proposed change was Item (4) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1224)

*Impact of Change:* In March 2002 less than 1% of the LNP LSRs were missing outbound timestamps and only a subset of those are affected by this change. Therefore, the impact on measurement results is expected to be minimal.

- (3) *Affected Measures:* O-8, O-9, O-14 and O-15

*Description of Change:* As part of the data reconciliation effort recently conducted by BellSouth with AT&T, BellSouth determined that an LNP LSR is reported as Partially Mechanized if it is *viewed* by a service representative in the Local Carrier Service Center ("LCSC"), even though the LSR is not manually processed by the service representative. In order to address AT&T's concerns, BellSouth proposes to make a coding change that will cause an LSR to be classified as Partially Mechanized only if it is *processed* by a Service Representative in the LCSC. Although this change was not previously identified, it is associated with Item (4) on the Preliminary September 2002 Data Notification filed on July 1, 2002 (RQ1224), and therefore is being worked in conjunction with this item.

*Impact of Change:* Fully Mechanized performance is not expected to change significantly, although Partially Mechanized performance is expected to decline somewhat. Approximately 19% of the LNP LSRs categorized as Partially Mechanized in March 2002 data were viewed, but not processed by a Service Representative in the LCSC.

- (4) *Affected Measures:* O-1 & O-2

*Description of Change:* The BellSouth TAG Server is located in Charlotte, NC, which is in the Eastern Time zone. Currently, in order to ensure uniformity, BellSouth mechanically subtracts one hour from the Acknowledgement Measurements to coordinate with other systems located in the Central Time zone. BellSouth is eliminating this mechanized adjustment by implementing a coding change to convert the TAG time stamp to Central time. This proposed change was Item (5) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1373)

*Impact of Change:* None

- (5) *Affected Measures:* O-7, O-8, O-9 & O-11

*Description of Change:* BellSouth has certain retail accounts (primarily medium to large businesses) that have been assigned their own OCN /ACNA because they have switching equipment on premises. Currently, because of the presence of a non-BellSouth OCN or ACNA, ordering data related to these accounts can be included in the CLEC aggregate results, although this situation is not likely to occur because BellSouth retail customers do not submit LSRs. However, BellSouth will implement a coding change to ensure that these accounts are not included in CLEC aggregate results. This proposed change was Item (6) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ891)

*Impact of Change:* In March 2002 data, there were no LSRs for the OCNs/ACNAs that would be excluded by this coding change. Therefore, this change should have minimal, if any impact on reported results.

(6) *Affected Measures:* O-8 & O-9

*Description of Change:* When an LSR receives multiple Firm Order Confirmations ("FOCs"), duration is calculated only on the first FOC. Currently, if multiple FOCs are returned in multiple months, the LSR is included in FOC Timeliness for each month, and the same duration is reported in each month since the measurement is calculated using only the first FOC. BellSouth proposes to implement a coding change so that the LSR will be reported only in the month in which the first FOC is sent. This same change applies to Reject Interval. This proposed change was Item (8) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1063)

*Impact of Change:* Less than 1% of the LSRs included in the March 2002 FOC Timeliness report and less than 1% of those included in the March 2002 Reject Interval report were also included in the respective February reports. There are no characteristics that indicate the LSRs impacted by this change are different from the average LSR, so there will be negligible impact on the measurement results.

(7) *Affected Measures:* O-10

*Description of Change:* As part of the third-party test in Florida, KPMG Consulting Inc. ("KCI") issued an observation in connection with its inability to to replicate the April 2002 "Ordering: Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual" SQM Report. (Observation 213). According to KCI, the data did not reflect the interval label on the SQM Report. For example, an interval bucket labeled "> 3 - <= 5 Days" should contain data where the Service Inquiry with LSR Firm Order Confirmation (FOC) Response Interval duration is greater than three days and less than or equal to five days. However, according to KCI, the interval bucket actually contained data when the duration was greater than or equal to three days and less than five days. BellSouth is implementing a change to ensure consistency between the reported interval data and the interval labels on the SQM Report. The change is being made in response to concerns expressed by KCI. (RQ1700)

*Impact of Change:* The change will have no impact on overall performance results, as it affects only the number of orders assigned to various interval categories.

### Provisioning Measurements

- (8) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, P-10, P-12 & P-14.

*Description of Change:* As part of the third-party test in Florida, KCI recently issued second amended exception 151 which is related to this change request. In validation efforts by BellSouth it became apparent that the classification of orders with less than 10 lines and greater than 10 lines was inaccurate for purposes of these provisioning measures. BellSouth proposes to make a coding change to utilize the SPO or SWO FIDs from the orders, which will allow BellSouth to more accurately identify, capture, and record the number of lines for purposes of these measures. This change is being made in response to concerns expressed by KCI. (RQ1567)

*Impact of Change:* BellSouth is unable to quantify the impact for each of the affected measures, but expects it to be minimal, as a small percentage of orders are for greater than 10 lines.

- (9) *Affected Measures:* P-9

*Description of Change:* As part of the third-party test in Georgia, KCI has issued an exception in connection with the % Provisioning Troubles Within 30 Days of Service Order Completion measure. (Exception 152). In responding to this exception, BellSouth determined that service orders that had a trouble within five days are being excluded from the denominator in calculating the results for this measure, even though those same troubles are being included in the numerator. BellSouth is making a change to include service orders that had a trouble within five days in the denominator for purposes of calculating this measure. The change is being made in response to concerns expressed by KCI. (RQ1703)

*Impact of Change:* For all states other than Louisiana (which requires that BellSouth calculate performance based on the % Provisioning Troubles Within 5 Days of Service Order Completion), BellSouth estimates that this change will result in a less than 0.2% improvement in reported results.

- (10) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, & P-9.

*Description of Change:* BellSouth recently uncovered that, in connection with the implementation of PMAP 4.0, the retail analog for ADSL is being undercounted in Kentucky and Florida. Specifically, Billing Account Numbers ("BANs") are hard coded, and two BANs associated with retail ADSL were incorrectly specified in the code. BellSouth is proposing a coding change to correct this error. Although this change was not previously identified, BellSouth only



recently determined the need to make this change, and, because of the potential impact in Kentucky and Florida, BellSouth believes that the change should be made effective with September data rather than waiting an additional data month. (RQ1647)

*Impact of Change:* Although unable to quantify the precise impact of the change for each of the affected measures, BellSouth has determined that approximately 700-1400 orders have been erroneously omitted from the retail analog data in Kentucky since April 2002.

(11) *Affected Measures:* P-8

*Description of Change:* BellSouth has determined that, in connection with the implementation of PMAP 4.0, all circuits were being included in both the numerator and denominator for purposes of calculating results for the Cooperative Acceptance Testing measure, which caused BellSouth's performance to be 100%. BellSouth proposes to correct the code to count in the numerator only those circuits that have successfully passed cooperative acceptance testing, as required by the SQM. Although this change was not previously identified, BellSouth believes that, because of the importance of DSL issues at the federal and state level, this change should be made effective with September data rather than waiting an additional data month. (RQ1571)

*Impact of Change:* Based on historical data, BellSouth estimates that this change will reduce BellSouth's performance by approximately 1 percentage point.

**Maintenance & Repair Measurements**

(12) *Affected Measures:* MR-2

*Description of Change:* Currently, in capturing line count records for PBX sub-metrics for this measure, BellSouth groups USOCs into General Class of Service categories. Some USOCs apply to both Business and PBX categories and are currently defaulting to Business. Because this tends to understate the line count records for PBX and Centrex, BellSouth proposes to implement a change by which the "max gen class" code would be utilized so that all PBX and Centrex USOCs are included in the line count records for PBX and Centrex sub-metrics. This proposed change as it relates to the PBX sub-metrics was Item (10) on the Preliminary September 2002 Data Notification filed on July 1, 2002, although BellSouth has since determined that the same change should be made for Centrex. (RQ1319)

*Impact of Change:* BellSouth is unable to quantify the impact of this change but expects it to be minimal.

(13) *Affected Measures:* MR-2

*Description of Change:* BellSouth has determined that trouble reports associated with two product identifications – 5011 and 5021 – are not being captured in the volumes for BellSouth's retail customer trouble reports for the Design (Specials) sub-metrics. This omission has caused BellSouth to understate the retail customer trouble report rate for these resale sub-metrics. To address this problem, BellSouth proposes to make a change to include product identifications 5011 and 5021 in the retail troubles for the Design (Specials) sub-metrics. Although this change was not previously identified, BellSouth believes that the potential impact warrants making the change effective with September data rather than waiting an additional data month. (RQ1193)

*Impact of Change:* BellSouth estimates that this change will reduce BellSouth retail results for the Design (Specials) sub-metrics by approximately 2 percentage points.

(14) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

*Description of Change:* BellSouth recently discovered an error associated with the reporting of troubles associated with CLEC Digital Loops for purposes of these maintenance and repair measures as reflected in the MSS. Specifically, although line counts and troubles associated with CLEC Digital Loops are captured on the SQM maintenance and repair reports, this same information was inadvertently omitted from the UNE Other Design results as reflected on the MSS. BellSouth proposes to make a change to correct this omission. Although not previously identified, BellSouth only recently discovered the need to make this change. (RQ1707)

*Impact of Change:* BellSouth has not been able to quantify the impact of this change for all of the affected measures, but expects it to be minimal.

(15) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

*Description of Change:* Currently some records processing through PMAP are missing wire center identifications, which cause them to be excluded from the measures. BellSouth is implementing a change to create a wire/frame table to be used as an additional means to identify valid wire center information, which would reduce the number of records in error due to incorrect wire center identifications. This proposed change was Item (9) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1176)

*Impact of Change:* BellSouth expects the impact of this change to be minimal, as less than 300 records would have been affected by this change in the April data month.

456961v2

## **PRELIMINARY OCTOBER 2002 DATA NOTIFICATION**

BellSouth is considering make the following changes, described below, to generate results for the October 2002 data month, preliminary results for which will be posted on November 21, 2002, with final results being posted on December 2, 2002. BellSouth provides this notice consistent with the Georgia Public Service Commission's July 19, 2002 Order, which requires that, on the first business day of the month preceding the data month for which BellSouth proposes to make any change to method by which its performance data is calculated, BellSouth must provide written notice of any such proposed changes as well as provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following month. The "affected measures" described in the notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, and all impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

### **Ordering Measurements**

- (1) *Affected Measures:* OSS-2

*Description of Change:* Beginning with May 2002 data, the results from the ATLAS and COFFI systems were inadvertently reported separately. Because the SQM requires that ATLAS and COFFI system availability results be combined, BellSouth proposes to combine the reports consistent with the SQM. (RQ1669)

*Impact of Change:* None, as the results are the same for both systems.

- (2) *Affected Measures:* O-8, O-9, O-14 & O-15

*Description of Change:* As previously identified in its June 2002 Data Notification, BellSouth proposed to make coding changes to capture an additional identifier for Local Service Requests ("LSRs") submitted via EDI that was implemented in connection with Release 10.5. Similar changes need to be made to capture this identifier for LSRs submitted via TAG and processed through LEO or the LNP Gateway as well as to ensure that PMAP recognizes and uses these additional identifiers in calculating performance results. (RQ1141 & RQ1627)

*Impact of Change:* Less than 1.0%

- (3) *Affected Measures:* All Ordering Measures.

*Description of Change:* Operating Company Number (OCN) 4384 was assigned to KPMG Consulting, Inc. ("KCI") for purposes of the third party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN,

making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in ordering measurements on a going-forward basis. (RQ0948)

*Impact of Change:* None

(4) *Affected Measures:* O-11

*Description of Change:* Currently, in calculating the non-trunk data associated with this measure, BellSouth takes a "snapshot" generally on the 2nd day of the month. To allow additional time to appropriately report completeness for Local Service Requests ("LSRs") received late in one month for which a FOC or Reject is sent early the following month, BellSouth proposes that this "snapshot" be taken no earlier than the 4<sup>th</sup> day of the month. (RQ1644)

*Impact of Change:* BellSouth is unable to quantify the impact of this change, but expects it to be minimal.

*Affected Measures:* PO-1

*Description of Change:* Currently, the MSS data for Manual Loop Makeup Response time is being measured against a benchmark of 3 minutes. This data should be measured against a benchmark of 3 Business Days (RQ1631)

*Impact of Change:* An improvement in BellSouth's performance.

### **Provisioning Measurements**

(5) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, P-10, P-12 & P-14

*Description of Change:* Consistent with the SQM, administrative orders should be excluded from these measures. However, BellSouth has determined that a type of administrative order associated with administrative changes to a large volume of existing customer accounts is not being excluded. This type of administrative order, which is called a MECHSO order, is typically necessary to change USOCs or FIDs and is commonly issued as an automatic completion (ACY), both for BellSouth retail and wholesale customers. An example of a MECHSO order is when a state public service commission mandates a change in the class of service in a calling area to include an entire county. BellSouth proposes to make a change to exclude MECHSO orders from these provisioning measures as required by the SQM. (RQ0606)

*Impact of Change:* BellSouth is unable to quantify the impact for each of the affected measures, but expects it to be minimal, as the base of orders should be reduced by less than 1%.

- (6) *Affected Measures:* All Provisioning Measures.

*Description of Change:* OCN 4384 was assigned to KCI for purposes of the third-party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN, making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in provisioning measurements on a going-forward basis. (RQ0948)

*Impact of Change:* None

- (7) *Affected Measures:* P-3, P-4, P-5, P-6, P-9 & P-10

*Description of Change:* BellSouth will be making a coding change to exclude orders with a miscellaneous account code and a class of service code of ADF, that are being issued to establish billing on resale and retail customers for DSL and satellite TV. These orders currently are being captured in the Retail and Resale Business as well as the Retail DSL categories, even though the orders are for billing and administrative purposes and should be excluded from these measures consistent with the SQM. (RQ831)

*Impact of Change:* Approximately 23% of BellSouth retail orders completed in June 2002 in Georgia would be affected by this change and would have been excluded from the affected measures. This change would have a minimal impact on Resale results, as there were only approximately 10 such orders in June 2002.

- (8) *Affected Measures:* P-4

*Description of Change:* BellSouth is proposing to make coding changes to use the issue date on the Service Order as the initial timestamp for the Order Completion Interval (OCI) measure, rather than the application date. Although the issue date and the application date are generally the same, in some cases when the Service Order is modified the application date is revised, even though the same Service Order is being used to provision the service. For example, if a customer changes the due date after the Service Order is issued, the application date may be changed to when the new due date is entered on the order, although the issue date would not change. Because the date for purposes of calculating OCI should not vary depending upon whether a Service Order is modified, BellSouth believes using the issue date is more appropriate. (RQ0717)

*Impact of Change:* BellSouth estimates that this change will impact less than 1% of the Service Orders for both wholesale and retail.

(9) *Affected Measures:* P-5

*Description of Change:* BellSouth is proposing a change to correct the beginning timestamps for purposes of calculating Average Completion Notice Interval (ACNI) for Design orders. This change would correct the problem that is currently being experienced by which the ACNI interval is inflated because it is measured from the first circuit location rather than the last one when the entire work order is completed. This change is consistent with the SQM, which requires that the ACNI interval measure the "elapsed time between the BellSouth reported completion of work and the issuance of a valid completion notice to the CLEC." (RQ759)

*Impact of Change:* BellSouth estimates that this change will cause a significant reduction in the ACNI intervals for both CLECs and BellSouth, although BellSouth retail results will experience a greater reduction because BellSouth tends to have more orders with more circuit locations. Most notices are sent within the hour of completion and the current Design intervals are in the hundreds of hours (for example, in April 2002, the Georgia Design Dispatch ACNI Mechanized interval was 304 hours, compared to 41 hours for the CLECs).

(10) *Affected Measures:* P-7A

*Description of Change:* BellSouth proposes to simplify the replication of data for this measure by pre-classifying data based on "early", "on-time", and "late". This will aid in replication and validation of data and simply reflects these classifications earlier in the process. No change in coding is involved in producing the results. (RQ1570)

*Impact of Change:* None.

**Maintenance & Repair Measurements**

(11) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

*Description of Change:* BellSouth is considering implementing a coding change that would identify WFA records in PMAP that have a mismatch between a company code and product code. This would allow BellSouth to assign an error code for tracking and analysis purposes when, for example, a BellSouth company code indicates a UNE product. This change was previously addressed in the Preliminary September Data notification filed on July 1, 2002. (RQ1140)

*Impact of Change:* None

- (12) *Affected Measures:* MR-1, MR-2, MR-3, MR-4, MR-5, MR-6 & MR-7

*Description of Change:* Currently ADSL products are identified using a hard coded work around product ID routine. BellSouth is considering a change that will begin using the standard product ID routine as used for other products. (RQ1261)

*Impact of Change:* None

- (13) *Affected Measures:* All Maintenance and Repair Measures

*Description of Change:* OCN 4384 was assigned to KCI for purposes of the third-party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN, making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in maintenance and repair measurements on a going-forward basis. (RQ0948)

*Impact of Change:* None

- (14) *Affected Measures:* M&R 2

*Description of Change:* Currently some line count records processing through PMAP contain incorrect wire center identifications, which cause records to fall into an error bucket that is excluded from the measures. This impacts UNE 2 wire analog loop non-design lines. BellSouth is implementing a change to utilize the wire/frame table, initially described in the Preliminary September Data Notification filed on July 1, 2002, to be used as an additional means to identify valid wire center information, which would reduce the number of records falling into error bucket due to incorrect wire center identifications. (RQ1611)

*Impact of Change:* BellSouth estimates that this change will cause the denominator for CLEC data for this measure to increase which will improve the customer trouble report rate performance for CLEC's.